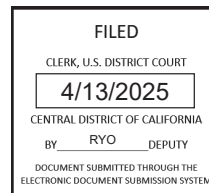


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6 IN PRO PER



7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

9
10 TODD R. G. HILL, individually, and as
11 attorney-in-fact, guardian ad litem to
12 ROES 1-8,

13 Plaintiff,

14 v.

15 THE BOARD OF DIRECTORS,
16 OFFICERS AND AGENTS AND
17 INDIVIDUALS OF THE PEOPLES
18 OF THE COLLEGE OF LAW;

19 Defendants.

Case No. 2:23-cv-01298-JLS-BFM

**PLAINTIFF'S NOTICE OF ERRATA AND
CORRECTED OPPOSITION TO
DEFENDANT SPIRO'S MOTION TO
DISMISS (DKT. 263)**

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

PLAINTIFF’S NOTICE OF ERRATA AND CORRECTED OPPOSITION TO DEFENDANT SPIRO’S MOTION TO DISMISS (DKT. 263)

TO THE HONORABLE COURT AND ALL PARTIES AND COUNSEL OF RECORD:

Plaintiff Todd R.G. Hill respectfully submits this Notice of Errata to correct a versioning error in connection with his Opposition to Defendant Spiro’s Motion to Dismiss the Fourth Amended Complaint, which was submitted via the Court’s Electronic Document Submission System (EDSS) on April 13, 2025 under Tracking Number EDS-250413-001-9203.

Due to inadvertence, Plaintiff submitted an anticipatory in-progress version of the document titled **“PLAINTIFF’S OPPOSITION TO DEFENDANT SPIRO’S MOTION TO DISMISS THE FOURTH AMENDED COMPLAINT v5 04132025.pdf”**. Upon review, Plaintiff identified that this version contained an erroneous reference to Federal Rule of Civil Procedure 8, incorrectly asserting that Defendant Spiro raised a Rule 8 argument in Docket 263. Defendant’s motion makes no such claim.

In addition, the earlier version did not include Plaintiff’s finalized section headings and did not incorporate all portions of the revised language that were part of the completed Opposition draft. Plaintiff has now corrected this issue and respectfully submits the intended, finalized version titled: **“PLAINTIFF’S OPPOSITION TO DEFENDANT SPIRO’S MOTION TO DISMISS THE FOURTH AMENDED COMPLAINT v8 04132025.pdf”**

This corrected version:

1. Removes the erroneous paragraph responding to an argument not raised;
2. Incorporates fully finalized headings and improved structural alignment; and
3. Clarifies and strengthens factual rebuttals without altering the substantive positions taken.

1 Plaintiff notes that this anticipatory draft was developed in part due to Defendant's failure to
2 identify with specificity the legal grounds or relief sought during the meet and confer process,
3 necessitating predictive drafting to preserve procedural integrity under Local Rule 7-3.

4 No other substantive changes have been made. Plaintiff respectfully requests that the Court
5 consider this corrected version as the operative Opposition in response to Docket 263.

6 As the initial submission has not yet been docketed, this correction imposes no prejudice on any
7 party and is submitted in the interest of clarity and procedural accuracy.

8 Respectfully submitted,

9 Dated: April 14, 2025

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14 Todd R. G. Hill
15 Plaintiff, In Propria Persona

16
17 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

18 The undersigned party certifies that this brief contains 334 words, which complies with the 7,000-
19 word limit of L.R. 11-6.1.

20 Respectfully submitted,

21 
22
23

24 March 28, 2025

25 Todd R.G. Hill

26 Plaintiff, in Propria Persona

Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R.

5-3.2.1

Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,



April 14, 2025

Todd R.G. Hill

Plaintiff, in Propria Persona